

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SHDRICK BOWES-NORTHERN

Plaintiff,

v.

CITY OF CHICAGO, et al.,

Defendants.

Case No. 1:21-CV-03351

Honorable Judge Virginia Kendall

MOTION FOR RELIEF FROM ASSIGNMENT AND LEAVE TO WITHDRAW

Amanda A. Sonneborn, court-assigned counsel for the plaintiff, Shedrick Bowes-Northern (“Bowes-Northern”), and Ms. Sonneborn’s associates, Jalise R. Burt and Andrew R. Cockroft, move this Court pursuant to Northern District Court of Illinois Local Rule 83.38(a)(3) for relief from the order of assignment of Ms. Sonneborn as Mr. Bowes-Northern’s counsel in this action, and for leave to withdraw as counsel for Mr. Bowes-Northern, and in support thereof, states as follows:

1. This action involves a claim for violation of state and federal law, based on the Defendants’ excessive force and failure to intervene that caused injuries to Mr. Bowes-Northern while he was in Defendants’ care, custody, and control.

2. By Order entered April 20, 2022, this Court appointed Amanda A. Sonneborn of King & Spalding LLP to serve as counsel for Mr. Bowes-Northern pursuant to Local Rules 83.11(h) and 83.37.

3. Since that time, Ms. Sonneborn, together with other attorneys at King & Spalding LLP, including Ms. Burt and Mr. Cockroft, have regularly communicated with Mr. Bowes-Northern regarding his case to develop a litigation and discovery strategy.

4. Through Mr. Bowes-Northern's communications with counsel, including most recently on October 26, 2022, Mr. Bowes-Northern requested that the undersigned resign and withdraw from representing Mr. Bowes-Northern in this matter.

5. It has become clear that fundamental and substantial disagreements between Mr. Bowes-Northern and the undersigned exist regarding the litigation strategy for this case, including the scope of the lawsuit and the conduct of discovery. At this point, the attorney-client relationship is irreparably broken.

6. In light of these incompatibilities, continued representation of Mr. Bowes-Northern is not feasible.

7. Local Rule 83.38(a)(3) provides for assigned counsel to move for relief from an order of assignment on the basis that "some personal incompatibility or a substantial disagreement on litigation strategy exists between counsel and the party."

8. Under the circumstances, counsel respectfully requests that, in accordance with Local Rule 83.38(a)(3), this Court enter an order granting relief from the order of assignment in this matter, and granting leave for Ms. Sonneborn, Ms. Burt, and Mr. Cockroft to withdraw as counsel of record.

WHEREFORE, Amanda A. Sonneborn, Jalise R. Burt, and Andrew R. Cockroft of King & Spalding LLP, respectfully request that this Court enter an order relieving Ms. Sonneborn from appointment and permitting their withdrawal as counsel of record in this matter.

Dated: October 27, 2022

Respectfully submitted,

/s/ Amanda A. Sonneborn

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Counsel for Plaintiff

Shedrick Bowes-Northern

CERTIFICATE OF SERVICE

I hereby certify that, on October 27, 2022, a copy of **Motion for Relief from Assignment and Leave To Withdraw** has been filed electronically with the Clerk of the Court using CM/ECF. Notice of this filing will be sent to the following parties, if registered, by operation of the Court's electronic filing system:

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